

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES
INNOVATIONS, LLC

Plaintiff,

VS.

GUARDIAN PROTECTION SERVICES,
INC.

Defendant.

ROTHSCHILD CONNECTED DEVICES
INNOVATIONS, LLC

Plaintiff,

VS.

ICON SECURITY SYSTEMS, INC.

Defendant.

Case No: 2:15-cv-01431-JRG-RSP

LEAD CASE

Case No: 2:15-cv-001468-JRG-RSP

CONSOLIDATED CASE

MOTION TO DISMISS DEFENDANT ICON SECURITY SYSTEMS, INC.
WITHOUT PREJUDICE

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a settlement agreement, Plaintiff Rothschild Connected Devices, LLC (“Rothschild”) files this Unopposed Motion to Dismiss Defendant Icon Security Systems, Inc. (“Defendant” or “Icon”) Without Prejudice. Plaintiff states that in accordance with Rule 41, this dismissal is being filed prior to the filing of an answer or motion for summary judgment.

Wherefore, Symbology moves this Court to dismiss this action and all claims by Symbology against Icon, without prejudice, with each party to bear its own costs, attorney's fees and other litigation expenses and request that the Court enter the proposed order of dismissal submitted herewith.

Dated: November 25, 2015

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON

State Bar No. 24067322

BRAD KIZZIA

State Bar No. 11547550

ANTHONY RICCIARDELLI

State Bar No. 24070493

KIZZIA JOHNSON, PLLC

750 N. St. Paul Street, Suite 1320

Dallas, Texas 75201

(214) 613-3350

Fax: (214) 613-3330

jay@kjpllc.com

brad@kjpllc.com

anthony@brownfoxlaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this November 25, 2015.

/s/ Jay Johnson

Jay Johnson